

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

LINDA VALERINO

PLAINTIFF,

v.

ERIC HOLDER, IN HIS OFFICIAL CAPACITY AS  
UNITED STATES ATTORNEY GENERAL,

DEFENDANT.

FILED THIS 10 DAY OF Dec. 2014  
GLENDALAKE, ESQ.  
CLERK OF COURT  
BY [Signature]  
DEPUTY

CIV. NO. 08-CV-00035 (HB)

JURY TRIAL DEMANDED

**PLAINTIFF'S REPLY TO FORMER COUNSEL'S "REPLY" (Sic)**

COMES NOW Plaintiff, Linda Valerino, pro se, with permission of the Court, and replies to terminated counsel's response (labeled "Reply," Doc. 203<sup>1</sup>) to Plaintiff's request for an Emergency Motion for an Order to Show Cause (Doc. 201).

Mr. Manning further breached Plaintiff's attorney-client privileged communication publically, to the Defendant, and this Court, through his "characterization" of the settlement communication between himself and Plaintiff. See Doc. 203. As well, Mr. Manning breached the attorney-client privilege for revealing that his billing of client was for "possibly more than one thousand emails and telephone calls" that he had to endure. Plaintiff will exercise "massive restraint" not to respond to Mr. Manning's characterization of what "he" had to "endure" or the settlement discussions as not to waive any attorney-client privilege. The privilege extends beyond the representation and Mr. Manning has violated it.

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<sup>1</sup> Attorney Manning dated the document December 8, 2014 even though it was filed and served on December 9, 2014; and a certification was executed that he gave service to the Defendant and Plaintiff both on December 8, 2014, when in fact, the certificate of service was served via ECF on December 9, 2014.

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Pltff Reply to Terminated Counsel's "Reply" (Sic).

December 10, 2014

Mr. Manning has failed to produce a valid reason in his response brief for filing his alleged attorney fees in a Motion to Withdraw as Counsel before the Court, Defendant, and the public. Common sense dictates for a client to terminate her counselor 5 weeks before trial, that there is just and good cause.

Plaintiff renews her Emergency Motion for an Order to Show Cause as Mr. Manning has now made false statements to the Court in his "reply" (sic.). Mr. Manning has never provided Plaintiff a detailed invoice totaling the amount claimed in his Motion to Withdraw. See Doc. 200 ¶ 1. Mr. Manning has now escalated the need for an Order to Show cause for contempt in his misrepresentation of the truth to the Court. Additionally, Mr. Manning is attempting to use the Valerino 2 litigation as an avenue to engage in a fee dispute with Plaintiff as an intimidation tactic and disrupt the current status of this litigation with the Court. If Mr. Manning's true intentions were to document what he believes he has earned, it would not have appeared in a Motion to Withdraw as Counsel filed publically by a licensed attorney. It would have appeared in a final invoice to the Plaintiff; and later filed in an affidavit for attorney fees 30 days after a favorable Plaintiff judgment. Mr. Manning's behavior was not proper nor did he claim ignorance for his actions.

Respectfully submitted,

Linda I. Valerino, Pro se  
Plaintiff

Dated: December 10, 2014

By: /s/ Linda I. Valerino   
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December 10, 2014

**CERTIFICATE OF SERVICE**

I certify that on December 10, 2014, I filed the foregoing with the Clerk of the Court who will file it using the CM/ECF system, which will send a notification of such filing to:

Stephanie Fidler  
Assistant United States Attorney  
United States Attorney's Office  
99 N.E. 4<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Miami, FL 33132

ATTORNEY FOR DEFENDANT

Former Counsel: Yohana Manning

By: /s/ Linda I. Valerino  
LINDA I. VALERINO  
PLAINTIFF, Pro Se

